Motion GRANTED, conditioned upon the timely filing of a waiver of speedy trial.

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE MIDDLE DIVISION OF AMERICA

UNITED STATES OF AMERICA)	V
v.)	No. 3:12-00175 JUDGE TRAUGER
ROBERT H. JOHNSON)	

MOTION TO CONTINUE TRIAL

Through counsel, defendant Robert H. Johnson moves to continue his April 22, 2014 trial. Mr. Johnson is in federal custody pursuant to a writ from state custody.

In support of this motion, defense counsel would show the following: Defense counsel has received and reviewed discovery in this case and continues to have ongoing discussions with Mr. Johnson about his case. Counsel has initiated discussions with the government and proposed an agreed disposition. Undersigned counsel believes this matter likely can be resolved by an agreed disposition. However, additional time is needed to for the parties to reach a resolution. Mr. Johnson therefore requests that the April 22, 2014, trial be continued.

Mr. Johnson concurs in the request to postpone this matter and will be filing a speedy trial waiver.

Due to personal scheduling conflicts, counsel requests that this matter *not* be rescheduled April 28-May 11 or July 28-August 5, 2014.

Respectfully submitted,

/s/ Caryll S. Alpert
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